

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Service)	CC Docket No. 98-67
And Speech-to-Speech Services)	
For Individuals with)	
Hearing and Speech Disabilities)	
)	
Americans with Disabilities Act of 1990)	CG Docket 03-123

COMMENTS OF NENA¹

The National Emergency Number Association (“NENA”) hereby responds to the Petitions for Reconsideration in the captioned proceeding submitted by AT&T and Verizon.² Like AT&T (Petition, 4) and Verizon (Petition, 1), we supported the change in the language of Section 64.04(a)(4) directing TRS operators to route calls to an “appropriate” PSAP. (Comments of NENA and APCO, August 29, 2002)

In hindsight, we wish that we had also encouraged the substitution of “an” for “the” as a further qualification of the change. We agree with AT&T that it would be costly in both time and money to ask, essentially, that TRS providers exactly duplicate the existing 9-1-1 routing system by sending calls directly to the same PSAPs that would have received voice calls from the same origin. We agree with Verizon (Petition, 3) that “an appropriate” PSAP can be identified through existing data bases that will allow TRS routing to mirror conventional voice

¹ This is an ex parte communication submitted pursuant to Section 1.1206 of the Rules. We regret our failure to file during the regular pleading cycle on the referenced petitions.

² AT&T Petition for Limited Reconsideration and for Waiver, September 24, 2003; Petition for Reconsideration of Verizon, September 24, 2003. The underlying FCC decision is the Report and Order in CC Docket 98-67, FCC 03-112, released June 17, 2003. (“Order”)

routing most of the time. In the balance of the cases, the handoffs from the first PSAP to a second can be achieved promptly and without undue risk.

We are constrained to repeat (Comments of August 29, 2002, at 1) that our preference is for all callers to dial 9-1-1 directly. We recognize, however, that many persons with hearing or speech disabilities prefer to use a TRS operator. We believe that preference can be exercised conveniently and safely by assuring that TRS operators are able to connect with one or more “appropriate” PSAPs, even if the connection does not always match the designated PSAP for conventional voice calls.

As we noted in our earlier Comments (at 2): “We would suggest . . . that the revision not attempt to qualify ‘appropriate’ as ‘most appropriate.’ Since the FCC’s regulations defer to others to designate a receiving PSAP, the use of a comparative adjective is unnecessary.” The same logic extends to the choice of “an” over “the,” as Verizon recommends. The former article recognizes there may exist more than one PSAP for the cost-effective receipt of TRS 9-1-1 calls.

A Useful Tool: NPR. While we agree with Verizon on the small but important change discussed above for the language of the rule, we differ with AT&T on the future steps needed to implement the new rule satisfactorily. There is no need, we believe, to “mandate the development and deployment” of a single database jointly by all TRS providers (Petition, 7) because such a tool already exists in the form of the National PSAP Registry (“NPR”). Developed by NENA and Intrado, with assistance from other partners,

[t]he primary goal of the Registry is to ensure the accuracy, timeliness and efficiency of the information that is passed among PSAPs, private call centers and other stakeholders in emergency situations. Because of the sensitive nature of the contact information

that will be contained within the NENA PSAP Registry, access to the Registry will be secure and password-protected.³

Of course, those TRS providers wishing to continue using directories organized to link the NPA-NXX of a call to an appropriate PSAP may continue to do so. (Order, ¶41)

The NPR, however, offers a means of geographic matching to find a PSAP -- by caller street address or by description of a PSAP's coverage area -- that will be centrally maintained and updated, avoiding the delays in state-by-state entry cited by AT&T. (Petition, 4)⁴ The NPR may be used to support computer file look-up or in a fully electronic transaction.⁵

Of course, the accommodations we make today for routing of TRS calls should not be considered permanent. In the future, we should expect TRS centers to connect to the national E9-1-1 infrastructure for automated delivery through systems already in place. This is the ultimate solution for accurate routing of TRS calls to 9-1-1.

At one point, joint public safety and industry study of "future paths" for 9-1-1 had led us to consider the use of 9-1-1 as an area code or "NPA." Such a system, we believed, might allow convenient insertion of calls into the 9-1-1 infrastructure without requiring a TRS center to install separate physical connections to all the selective routers in its coverage area. (Verizon Petition, 6) Upon further analysis of this approach, we identified a number of small difficulties

³ <http://www.nena9-1-1.org/PSAPs/index.htm>. TRS providers or other persons interested in using the NPR may call the NPR Manager at (800) 332-3911. The respective postal and e-mail addresses are NENA, 4350 N. Fairfax Drive, Suite 750, Arlington, VA 22203-1695, and psapregistry@nena.org.

⁴ The geographic linkage also fits well with routing of wireless 9-1-1 calls made through TRS centers, a subject of the Notice of Proposed Rulemaking associated with the Order.

⁵ That is, where the user sends a bid message with a key data item, the data base looks it up in the data files, and returns related data in an electronic message -- in this case, one or more PSAP names and 24-hour 10-digit numbers.

whose cumulative negative effects led us to investigate other potential solutions. NENA is currently evaluating several alternatives that could accomplish the objective through network translation methods. If these methods prove viable, we intend to suggest to the Commission how they might be used generally in call center relays to PSAPs.

The transitional problems associated with TRS integration into the 9-1-1 infrastructure are not unlike those facing telematics providers, satellite telephony and other services relying on call centers whose current connections to PSAPs depend on 10-digit numbers recognizable to the Public Switched Telephone Network ("PSTN"). Our aim must be to upgrade and/or redesign our public networks so that caller telephone numbers and/or locations flow through to the 9-1-1 infrastructure and allow routing to occur automatically. This is a goal of the NENA Future Path Plan and, we trust, of the upcoming National Reliability and Interoperability Council ("NRIC") focus on E9-1-1.

Conclusion. For the reasons discussed above, the Commission should clarify the TRS 9-1-1 routing requirements. As clarified, the requirements should retain their deadline of August, 2004.

Respectfully submitted

NENA

By _____

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Certificate of Service

The foregoing “Comments of NENA” have been served by mail today upon counsel for
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